

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

AFFLUENT ADS, LLC,

Plaintiff,

v.

JOVAN CAPUTO, PHILLIP LYNCH,
and ADTELLIGENT MEDIA, LLC,

Defendants.

Civ. A. No: _____

**[PROPOSED] ORDER ON PLAINTIFF'S
MOTION TO FOR EXPEDITED DISCOVERY**

AND NOW, this _____ day of _____, 2016, upon consideration of Plaintiff Affluent Ads, LLC's Motion for Expedited Discovery and any opposition thereto, and for good cause shown, it is hereby ORDERED that Plaintiff's Motion for Expedited Discovery is GRANTED. It is further ORDERED as follows:

1. Plaintiff shall serve upon Defendants, via overnight delivery and email, Expedited Requests for Production of Documents.
2. Within five (5) days following receipt of Plaintiff's Expedited Requests for Production of Documents, Defendants shall serve by overnight delivery responses to same, along with any requested or responsive documents.
3. Defendants shall make themselves available for depositions, which may be noticed as early as within three (3) days of Plaintiff's receipt of Defendants' responsive documents.
4. Plaintiff shall serve subpoenas upon the third-parties identified in its Motion.

5. Such further discovery as the parties mutually agree is necessary, or that the Court, upon motion of either party, deems necessary shall be completed as expeditiously as possible to allow full consideration of Plaintiff's application for an injunction.

Dated: July __, 2016

, J.